

# EXHIBIT EE

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CHARLENE CARTER )  
)  
) CIVIL ACTION NO.  
VS. ) 3:17-CV-02278-X  
)  
SOUTHWEST AIRLINES CO., AND )  
TRANSPORT WORKERS UNION OF )  
AMERICA, LOCAL 556 )

-----  
CONFIDENTIAL  
VIDEOTAPED DEPOSITION OF  
MEGGAN JONES  
NOVEMBER 4, 2020  
-----

ANSWERS AND DEPOSITION OF MEGGAN JONES,  
produced as a witness at the instance of the  
Plaintiff, taken in the above-styled and -numbered  
cause on NOVEMBER 4, 2020, at 9:05 a.m., before  
CHARIS M. HENDRICK, a Certified Shorthand Reporter  
in and for the State of Texas, witness located in  
Golden, Colorado, pursuant to the Federal Rules of  
Civil Procedure, the current emergency order  
regarding the COVID-19 State of Disaster, and the  
provisions stated on the record or attached hereto.

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1 A P P E A R A N C E S

2 FOR THE PLAINTIFF:

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10 FOR THE DEFENDANT, SOUTHWEST AIRLINES CO.:

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17 FOR THE DEFENDANT, TRANSPORT WORKERS UNION OF  
18 AMERICA, LOCAL 556:

19 MR. ADAM GREENFIELD  
20 MR. EDWARD B. CLOUTMAN, III  
21 LAW OFFICES OF CLOUTMAN & GREENFIELD, PLLC  
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24 (214) 939-9223  
25 agreenfield@candglegal.com  
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ALSO PRESENT: MR. MACK SPURLOCK -  
VIDEOGRAPHER

MS. CHARLENE CARTER  
MS. LAUREN ARMSTRONG

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1 PROCEEDINGS

2 THE VIDEOGRAPHER: We are now on  
3 record. Today's date is November 4th, 2020. The  
4 time is 9:05 a.m. Central. Will the court reporter  
5 please swear in the witness?

6 THE REPORTER: This is the videotaped  
7 deposition of Meggan Jones, and it is being  
8 conducted remotely in accordance with the current  
9 emergency order regarding the COVID-19 State of  
10 Disaster. The witness is located in Golden,  
11 Colorado. Counsel has agreed that I can swear in  
12 the witness from -- in -- out of state.

13 My name is Charis Hendrick, Court  
14 Reporter, CSR No. 3469. I am administering the  
15 oath and reporting the deposition remotely by  
16 stenographic means from my home in Ellis County,  
17 Texas.

18 Would counsel please state their  
19 appearances and locations for the record? And the  
20 city is fine.

21 MR. GILLIAM: Matthew B. Gilliam for  
22 plaintiff Charlene Carter in Springfield, Virginia.

23 MR. CORRELL: Mike Correll for  
24 defendant Southwest Airlines in Dallas, Texas.

25 MR. GREENFIELD: Adam Greenfield on

1     behalf of defendant TWU Local 556 from Dallas,  
2     Texas.

3                     MR. CLOUTMAN:   And Ed Cloutman also  
4     for TWU Local 556, Dallas, Texas.

5                     MEGGAN JONES,  
6     having been first duly sworn, testified as follows:

7                     EXAMINATION

8     BY MR. GILLIAM:

9             Q.   Good morning, Ms. Jones.   My name is --

10            A.   Morning.

11            Q.   My name is Matt Gilliam and I'm the  
12     attorney representing Charlene Carter in the matter  
13     of Carter v. Southwest Airlines and Transport  
14     Workers Union of America Local 556.   And I am here  
15     today to ask you some questions about the case.   If  
16     at any point you need a break, just let me know and  
17     we can take a break.   Have you been deposed before?

18            A.   I have not.

19            Q.   Okay.   So, basically, the way it works is  
20     I will -- I will ask you some questions, and if you  
21     could just answer to the best of your ability.  
22     Since the reporter is preparing a written  
23     transcript, it's important that you give clear,  
24     verbal answers; no huh-uhs and uh-huhs and no head  
25     nods or gestures.

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1 A. Tammy Shaffer.

2 Q. Okay. And is that in Southwest labor  
3 relations department?

4 A. Yes, it is.

5 Q. Okay. And prior to holding your current  
6 position with Southwest, what was your position  
7 with the company?

8 A. Inflight base manager at the Phoenix base.

9 Q. Okay. And how long were you the -- the  
10 base manager at the Phoenix base?

11 A. Officially, approximately a year and a  
12 half; just over a year and a half.

13 Q. Do you know when you started your -- your  
14 job there in Phoenix as inflight base manager?

15 A. I was formally offered the position in  
16 January of 2019.

17 Q. Okay. Did you start in January 2019?

18 A. I worked there as a temporary base manager  
19 for four months prior.

20 Q. Okay. Okay. And prior to working in  
21 Phoenix, what job did you hold with the company?

22 A. I was the assistant base manager at the  
23 Denver inflight base.

24 Q. Okay. And how long were you assistant  
25 base manager in Denver?

1           A. Approximately, three and a half to four  
2     years, approximately.

3           Q. And so when did you start your -- I guess,  
4     your job in that position?

5           A. It was in 2015. I don't recall the exact  
6     month.

7           Q. Okay. And did you leave that position in  
8     2018?

9           A. Officially left it in January of 2019.

10          Q. Okay.

11          A. My title changed.

12          Q. Okay. All right. And prior to being  
13     assistant base manager in Denver, what -- what job  
14     did you hold with the company?

15          A. I was an inflight supervisor at the Denver  
16     base.

17          Q. Okay. And how long were you an inflight  
18     supervisor?

19          A. With Southwest, 2011 is when I started.  
20     So, approximately, four years, give or take.

21          Q. Okay. And did you work with Southwest  
22     prior to 2011?

23          A. No, I did not.

24          Q. Okay. Have you ever worked as a flight  
25     attendant?



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1 A. Yes, I have.

2 Q. Okay. Which company -- for which company  
3 did you work as a flight attendant?

4 A. America West Airlines.

5 Q. Okay. And were you a member of the union  
6 when you worked at -- as a flight attendant at  
7 American West?

8 A. Yes, I was.

9 Q. Okay. Okay. What was the union?

10 A. It was the AFA.

11 Q. Okay. And did you hold any elected  
12 offices with your union?

13 A. I did not, no.

14 Q. All right. Well, so while you were  
15 assistant base manager in Denver, what were your  
16 job responsibilities?

17 A. My job was to support the base staff,  
18 support the flight attendants and to also support  
19 the base manager.

20 Q. Okay. Did you have any other  
21 responsibilities?

22 A. That support included, you know,  
23 recognition. It could include investigating any,  
24 like, potential work and conduct violations. It  
25 included staff development, things like that.

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1 religious accommodation requests that Southwest  
2 received each year?

3 A. No.

4 Q. Okay. Okay. All right. When did you  
5 first learn that a flight attendant had reported  
6 Ms. Carter for her Facebook posts and messages?

7 A. I don't recall when that was.

8 Q. Okay. If I could -- do you recall  
9 receiving a complaint about Ms. Carter's Facebook  
10 posts and messages?

11 A. No, I didn't receive a complaint about it.

12 Q. Okay. Who did?

13 A. I don't know who received that complaint.

14 Q. Okay. But you are aware of a complaint?

15 A. Yes, I am.

16 Q. Okay. And who made that complaint?

17 A. It was Audrey Stone.

18 Q. Okay. And at the time the complaint was  
19 made, did you know who Audrey Stone was?

20 A. Yes.

21 Q. Okay. And how did you know Audrey Stone?

22 A. She was the president of the union.

23 Q. Okay. And how did you know that she was  
24 union president?

25 A. The union puts that information out.

1 A. Okay.

2 Q. If you could just take a look at this.

3 And when you have had the chance to review it, let  
4 me know.

5 A. Okay.

6 Q. Do you know what this is?

7 A. It's an email.

8 Q. Okay.

9 A. From -- from Ed.

10 Q. And it's to employee relations DG; do you  
11 know who that is?

12 A. Yes, I do.

13 Q. Who is that?

14 A. It's the team that investigates any  
15 potential Title 7 issue.

16 Q. A team that invests (sic) Title 7 issues?

17 A. Like, harassment, you know, anything like  
18 that. Harassment policy, things like that.

19 Q. Okay. And is that what the employee  
20 relations group does?

21 A. Yes.

22 Q. Okay. And who are the, I guess, members  
23 of that employee relations team who would receive  
24 that email?

25 A. I don't know who is on that team.

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1 was reported by another flight attendant.

2 Q. And what else did he tell you about what  
3 the meeting dealt with?

4 A. I don't remember.

5 Q. Okay. Were you and Ed the only two in  
6 that meeting?

7 A. As far as -- what do you mean?

8 Q. Were you and Ed the only two in that  
9 meeting you had where he informed you what the --  
10 the fact-finding would be about?

11 A. Yes.

12 Q. Okay. Do you know if that was your first  
13 conversation with Ed Schneider about what -- I  
14 guess, about the Facebook messages and posts?

15 A. I don't recall.

16 Q. Okay. I would like to take you back to  
17 Document 1 again.

18 A. Okay.

19 Q. And if you could focus on 4228.

20 A. You said this was Document 1?

21 Q. Document 1, yeah.

22 A. Okay.

23 Q. And this -- this post mentions that the  
24 recall is going to happen. What is the recall?

25 A. The recall was -- effort to recall the

1 union officials that were holding office at that  
2 time.

3 Q. Okay. What does that mean?

4 A. Just -- it means that flight attendant  
5 union members -- some of the members had started a  
6 petition to recall the current elected officials.

7 Q. Okay. Do you know which members started  
8 the petition?

9 A. No.

10 Q. Okay. When did you first learn about the  
11 recall?

12 A. I don't know.

13 Q. Where did you hear about it?

14 A. At work.

15 Q. Who talked about it at work?

16 A. I don't remember.

17 Q. Did Jessica Parker talk to you about the  
18 recall?

19 A. No.

20 Q. Okay. Did you ever talk to Jessica Parker  
21 about the investigation into the Facebook posts?

22 A. No.

23 Q. Okay. Did you ever communicate with  
24 Jessica Parker about any aspect of the  
25 investigation into Carter's Facebook post?

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1 A. No.

2 Q. Okay. And do you know if the recall was  
3 successful?

4 A. I -- I don't know if it was or not.

5 Q. Okay. Do you know if any -- so as for the  
6 recall, would -- you mentioned that it was a  
7 petition to -- I think you mentioned that it was a  
8 petition, more or less, to remove union officers;  
9 is that right?

10 A. Yes.

11 Q. Okay. And would that have been to remove  
12 Audrey Stone as well?

13 A. Yes.

14 Q. Okay. Do you know if Audrey Stone was  
15 removed from the executive board?

16 A. I don't know.

17 Q. Okay. Do you know when that recall  
18 petition began?

19 A. No.

20 Q. Okay. Let's see. If I could direct you  
21 to -- let's see here. I am jumbled up. There we  
22 go. Document 9. And 4675 is the first page  
23 number.

24 A. I don't know that I have Document 9.

25 Okay. I -- maybe I do in a different email. Hang

1 on. Here we go. Okay. Let's see. Okay.

2 Document 9. And what was the page number?

3 Q. 4675.

4 A. Yes. Okay.

5 Q. And if you could take a look at that.

6 A. Okay.

7 Q. And not just 4675, but all of the attached  
8 pages as well.

9 A. Okay.

10 Q. Do you recognize this?

11 A. Yes, I do.

12 Q. And what is it?

13 A. It's an email from Ed to Maureen Emlet and  
14 Denise Gutierrez.

15 Q. Okay. And you are CC'd, correct?

16 A. Yes.

17 Q. Okay. Now, what -- do you recognize the  
18 pages behind that first page?

19 A. Yes.

20 Q. Okay. And what are those pages?

21 A. Those are the fact-finding notes.

22 Q. Okay. And did you draft those notes?

23 A. Yes.

24 Q. Okay. Now, who attended that fact-finding  
25 meeting?

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1           A. Charlene Carter, Chris Sullivan, myself,  
2     Ed Schneider, Denise Gutierrez and Edie Barnett.  
3     But Denise and Edie were conferenced in via phone.

4           Q. Okay. And was there anyone else there?

5           A. No.

6           Q. Okay. And I would like to direct you to  
7     4679.

8           A. Okay.

9           Q. And midway down, Ed says, we did go  
10    through it a little bit and there are some here --  
11    I guess the sentence before that, sentence is talk  
12    -- talk before that about -- well, Ed says, when  
13    you are posting on your Facebook page, are you  
14    aware of other posts on there that would connect  
15    you to Southwest Airlines? Possibly pictures of  
16    you in your uniform?

17                   And then it goes on and Ed says, we  
18    did go through a little bit and there are some  
19    here; shows pictures of Charlene at work in her  
20    uniform.

21                   Do -- do you know who obtained those  
22    pictures?

23                   MR. CORRELL: Objection.

24    Mischaracterizes the document. You can answer,  
25    Ms. Jones.



1 A. I did.

2 Q. (By Mr. Gilliam) Okay. And when did you  
3 obtain those pictures?

4 A. I don't remember when.

5 Q. Where did you obtain those pictures from?

6 A. Charlene's Facebook page.

7 Q. Okay. And do you remember the dates of  
8 those pictures?

9 A. I don't.

10 Q. Okay. And let's see if I can direct you  
11 to 4680.

12 A. Okay.

13 Q. It says -- let see. Midway down -- about  
14 midway down, there is a comment from Ed that says,  
15 with your Facebook post, there is a connection to  
16 the workplace and you can't have your political  
17 views with Southwest as part of your depiction  
18 there.

19 Do you know if Southwest has ever  
20 fired another employee for posting their political  
21 views on social media?

22 A. Yes.

23 Q. Okay. And what happened in that case?

24 A. The employee posted political views that  
25 were offensive to other individuals, and they were

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1 I, MEGGAN JONES, have read the foregoing  
2 deposition and hereby affix my signature that same  
3 is true and correct, except as noted above.

4  
5 \_\_\_\_\_  
6 MEGGAN JONES

7 THE STATE OF \_\_\_\_\_  
8 COUNTY OF \_\_\_\_\_

9 Before me, \_\_\_\_\_, on this day  
10 personally appeared MEGGAN JONES, known to me (or  
11 proved to me under oath or through \_\_\_\_\_) to  
12 be the person whose name is subscribed to the  
13 foregoing instrument and acknowledged to me that  
14 they executed the same for the purposes and  
15 consideration therein expressed.

16  
17 Given under my hand and seal of office this \_\_\_\_\_  
18 day of \_\_\_\_\_, 2020.

19  
20 \_\_\_\_\_  
21 NOTARY PUBLIC IN AND FOR THE  
22 STATE OF \_\_\_\_\_

23  
24 MY COMMISSION EXPIRES: \_\_\_\_\_  
25

1 REPORTER'S CERTIFICATION  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE NORTHERN DISTRICT OF TEXAS  
4 DALLAS DIVISION  
5 CHARLENE CARTER )  
6 )  
7 ) CIVIL ACTION NO.  
8 VS. ) 3:17-CV-02278-X  
9 )  
10 SOUTHWEST AIRLINES CO., AND )  
11 TRANSPORT WORKERS UNION OF )  
12 AMERICA, LOCAL 556 )

9 -----  
10 CONFIDENTIAL  
11 DEPOSITION OF MEGGAN JONES  
12 NOVEMBER 4, 2020  
13 (REPORTED REMOTELY)  
14 -----

13 I, CHARIS M. HENDRICK, Certified Shorthand  
14 Reporter in and for the State of Texas, do hereby  
15 certify to the following:

16 That the witness, MEGGAN JONES, was by me  
17 duly sworn and that the transcript of the oral  
18 deposition is a true record of the testimony given  
19 by the witness.

20 I further certify that pursuant to Federal  
21 Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)  
22 as well as Rule 30(e)(2), that review of the  
23 transcript and signature of the deponent:

24 \_\_xx\_\_ was requested by the deponent and/or a  
25 party before completion of the deposition.

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1        \_\_\_\_\_ was not requested by the deponent and/or  
2        a party before the completion of the deposition.

3                I further certify that I am neither  
4        attorney nor counsel for, nor related to or  
5        employed by any of the parties to the action in  
6        which this deposition is taken and further that I  
7        am not a relative or employee of any attorney of  
8        record in this cause, nor am I financially or  
9        otherwise interested in the outcome of the action.

10              The amount of time used by each party at  
11        the deposition is as follows:

12              Mr. Gilliam - 2:16 hours/minutes

13              Mr. Correll - 2 minutes

14

15              Subscribed and sworn to on this 12th day  
16        of November, 2020.

17

18

19

*Charis M. Hendrick*

20

CHARIS M. HENDRICK, CSR # 3469  
Certification Expires: 10-31-21  
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